

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

**JONATHAN COOPER,**  
8722 Tinker Hill Circle  
Lake Annette, Missouri 64746

and

**JEFFREY COOPER,**  
8722 Tinker Hill Circle  
Lake Annette, Missouri 64746,

Plaintiffs,

v.

**SHAWN REDDING,**  
16348 Clayton Avenue, East #2  
Rosemount, Minnesota 55068  
*(Service via First Class Mail)*

and

**DAKOTA TRANSPORT, INC.,**  
Serve: Registered Agent,  
Lyle Fritz, Chief Executive Officer  
6445 210<sup>th</sup> Street East  
Hampton, Minnesota 55031  
*(Service via First Class Mail)*

Defendants.

CASE ID:

COMPLAINT

**COMES NOW** Plaintiff, Jonathan Cooper, by and through his attorneys, and for his Complaint states:

**COUNT I – JONATHAN COOPER**

1. Plaintiffs, Jonathan Cooper and Jeffrey Cooper are citizens of Missouri. Defendant, Shawn Redding, is a resident of Minnesota. Defendant, Dakota Transport, Inc., a Minnesota corporation, is a citizen of Minnesota. Jurisdiction is based on 28 U.S.C. §1332 as

Plaintiffs and Defendants are citizens of different states and the matter in controversy exceeds the value of \$75,000.

2. On September 10, 2012, Plaintiff, Jonathan Cooper, was lawfully operating a motor vehicle in a southerly direction on Highway 77 in Winslow, Nebraska and while making a right turn onto Railroad Street was struck by a tractor trailer operated by Defendant, Shawn Redding.

3. At the same time and place Defendant, Shawn Redding, was operating a truck and trailer in a southerly direction on Highway 77 in Winslow, Nebraska.

4. Plaintiff, Jeffrey Cooper, was a passenger in an automobile operated by Jonathan Cooper as described in paragraph 2 above.

5. That on September 10, 2012, Defendant, Shawn Redding, negligently and carelessly operated a tractor and trailer causing a collision with the rear of the vehicle operated by Plaintiff, Jonathan Cooper.

6. Defendant, Shawn L. Redding, collided with the rear of the vehicle operated by Plaintiff and was thereby negligent.

7. The negligence of Defendants directly caused, or directly contributed to cause, Plaintiff, Jonathan Cooper, to suffer serious and permanent bodily injuries. Plaintiff has incurred medical expenses in the approximate amount of \$57,500, and lost income from employment as a result of the negligence of Defendants.

**WHEREFORE**, Plaintiff, Jonathan Cooper, demands judgment against Defendants, Shawn Redding and Dakota Transport, Inc., in the sum of Five Hundred Thousand Dollars (\$500,000) and costs of this action.

**COUNT II – JEFFREY COOPER**

8. Plaintiff, Jeffrey Cooper, alleges paragraphs 1 through 6 of Count I of this Complaint and by reference makes them a part of this count.

9. As a result, Plaintiff, Jeffrey Cooper, suffered serious bodily injuries. Plaintiff has incurred medical expenses in the approximate amount of \$14,500 and lost income from employment as a result of the negligence of Defendants.

**WHEREFORE**, Plaintiff, Jeffrey Cooper, demands judgment against Defendants, Shawn Redding and Dakota Transport, Inc., in the sum of Five Hundred Thousand Dollars (\$500,000) and costs of this action.

**PLAINTIFF'S ARE REQUESTING A JURY TRIAL.**

JONATHAN COOPER and JEFFREY COOPER,  
Plaintiffs

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ATTORNEYS FOR PLAINTIFFS